

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CARLTON TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	Case No. 07 C 06757
	)	Judge Coar
v.	)	Magistrate Judge Mason
	)	
JEFFREY GRAFSTEIN	)	
and BIZ 120, INC.,	)	Trial by Jury Demanded
	)	
Defendants.	)	

**PLAINTIFF'S AGREED MOTION FOR  
ENTRY OF A STIPULATED PROTECTIVE ORDER**

Plaintiff hereby moves this Court, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, for the entry of a Stipulated Protective Order submitted to the Court. In support of this Motion, Plaintiff states as follows:

1. In the course of this litigation, the parties anticipate producing information and documents that may contain confidential information such as confidential commercial or financial information; business plans or strategies; marketing plans or strategies; profit information; product and development information; sales information; or private personal information.

2. The parties wish to preserve the confidential nature of such information and documents, and good cause exists for the entry of the Stipulated Protective Order to ensure that the information retains its confidential status.

3. The parties submit that the proposed Protective Order will properly control discovery in accordance with applicable precedent and rules of procedure.

4. The parties agree on all matters set forth in the Protective Order submitted

to the Court.

WHEREFORE, Plaintiff respectfully requests that the Court enter the Stipulated Protective Order submitted to the Court.

Respectfully submitted,

Carlton Technologies, Inc.

By: /s/ John M. Dickman  
One of Its Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned, one of the attorneys for Plaintiff, hereby certifies that he served a true and correct copy of the foregoing PLAINTIFF'S AGREED MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER on March 5, 2008, through the Court's electronic filing system, to the individuals listed below:

Michael G. Kelber  
Chad W. Moeller  
Neal Gerber & Eisenberg LLP  
2 North LaSalle Street  
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Chicago, Illinois 60602

/s/ John M. Dickman

John M. Dickman